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SECRETARY OF THE SENATE

05 FEB 15 AM 11:00

**LOBBYING REPORT**

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required to Complete This Page

1. Registrant name	
Organization	Securities Industry Association
2. Address <input type="checkbox"/> Check if different than previously reported	
Address 1	1425 K Street NW, 7th Floor
City	Washington
State	DC
Zip Code	20005
Country	US
3. Principal place of business (if different than line 2)	
City	New York
State	NY
Zip Code	10271-0080
Country	U:
4a. Contact Name	b. Telephone number
Prefix Full Name	
Mr. Ira Hammerman	202-216-2000
	ihammerman@sia.com
c. E-mail	5. Senate ID #
7. Client Name <input checked="" type="checkbox"/> Self	6. House ID #
Securities Industry Association	

**TYPE OF REPORT** 8. Year 2004 Midyear (January 1-June 30)  OR Year End (July 1-December 31)

9. Check if this filing amends a previously filed version of this report

10. Check if this is a Termination Report  ⇨ Termination Date \_\_\_\_\_ 11. No Lobbying Activities

**INCOME OR EXPENSES - Complete Either Line 12 OR Line 13**

12. Lobbying Firms	13. Organizations
INCOME relating to lobbying activities for this reporting period was:	EXPENSES relating to lobbying activities for this reporting period were:
Less than \$10,000 <input type="checkbox"/>	Less than \$10,000 <input type="checkbox"/>
\$10,000 or more <input type="checkbox"/> ⇨ \$ _____	\$10,000 or more <input checked="" type="checkbox"/> ⇨ \$ <u>3,546,903</u>
Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).	14. REPORTING METHOD. Check box to indicate expected accounting method. See instructions for description of options.
	<input checked="" type="checkbox"/> <b>Method A.</b> Reporting amounts using LDA definitions
	<input type="checkbox"/> <b>Method B.</b> Reporting amounts under section 6033(b) Internal Revenue Code
	<input type="checkbox"/> <b>Method C.</b> Reporting amounts under section 162(e) Internal Revenue Code

Form 6

Printed Name and Title Ira Hammerman, Senior Vice President and General Counsel February 14, 2005







**Rider BAN.16****16. Specific Lobbying issues:****Bills:**

H.R. 522, Federal Deposit Insurance Reform Act;  
 H.R. 758, Business Checking Freedom Act;  
 H.R. 1000, Pension Security Act;  
 H.R. 1375, Financial Services Regulatory Relief Act;  
 H.R. 1776, Pension Preservation and Savings Expansion Act;  
 H.R. 2622, Fair and Accurate Credit Transaction Act;  
 H.R. 2043, United States Committee for Fair Capital Standards Act;  
 S. 1968, Retirement Security Act.  
 HR 4078, S. 2263, Lifetime Savings Accounts  
 S. 2424, National Employee Savings and Trust Equity Guarantee Act

**Congressional Issues:**

Retirement plan expansion;  
 Investment advice;  
 Basel II;  
 Deposit Insurance Reform;  
 Privacy of customer financial information.

**Executive Branch Issues:**

Coordination of SEC and banking regulatory examinations;  
 Financial privacy rules;  
 Regulations promulgating provisions of Gramm-Leach-Bliley Act, particularly provisions on financial and functional regulation issues;  
 Straight-through processing;

**Rider BAN.17****17. Houses of Congress and Federal agencies contacted:**

United States House of Representatives;  
 United States Senate;  
 Securities and Exchange Commission;  
 Federal Reserve Board;  
 United States Department of Treasury;  
 Judicial Review Commission on Foreign Asset Control;  
 Department of Labor;  
 Municipal Securities Rulemaking Board.

**Rider BAN.18****18. Name and title of each employee who acted as a lobbyist:**

Storrs, Josie Gray – Vice President, Congressional Relations;  
 Judge, J. Steven – Senior Vice President, Government Affairs;  
 Varley, Elizabeth – Vice President and Director, Retirement Policy *Covered Official Position: Counsel Senate Special Committee on Aging, February 1995 to April 1999;*  
 Rives, Elizabeth L. – Vice President, Policy Analysis and Communications;  
 Sorcher, Alan – Vice President and Associate General Counsel. *Covered Official Position: Counsel, F Reserve Board, January 1993 to March 1999;*  
 Udoff, Michael D. – Vice President, Associate General Counsel and Secretary;  
 Hunt, Richard – Senior Vice President, Federal Policy. *Covered Official Position: Chief of Staff, Repr*

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Lackritz, Marc E. – President;  
Spellman, James D. – Senior Vice President, Corporate Communications;  
Michaelis, Daniel V. – Assistant Vice President, Corporate Communications;  
Kursman, Scott C. – Vice President and Associate General Counsel;  
Quinn, Gerard J. – Vice President and Associate General Counsel;  
Draper, Margaret – Vice President, Corporate Communications;  
Christian, Joan – Manager, Corporate Communications;  
Brandon, Kyle – Vice President and Director, Securities Research;  
Paret, Jonathan P. – Vice President and Legislative Counsel;

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**Rider CDT.16**

**16. Specific Lobbying issues:**

**Bills:**

S. 14, The Energy Policy Act.

**Executive Branch Issues:**

Implementation of Commodity Futures Modernization Act of 2000.

**Rider CDT.17**

**17. Houses of Congress and Federal agencies contacted:**

House of Representatives;  
United States Senate;  
United States Department of Treasury;  
Securities and Exchange Commission;  
CFTC.

**Rider CDT.18**

**18. Name and title of each employee who acted as a lobbyist:**

Lackritz, Marc E. – President;  
Judge, J. Steven – Senior Vice President, Government Affairs;  
Robinson, Rachel – Vice President. *Covered Official Position: Director of Speaker's Operations, Office of the Speaker of the House of Representatives, January 1996 to December 1998;*  
Spellman, James D. – Senior Vice President, Corporate Communications;  
Michaelis, Daniel V. – Assistant Vice President, Corporate Communications;  
Paret, Jonathan P. – Vice President and Legislative Counsel;  
Draper, Margaret – Vice President, Corporate Communications;  
Christian, Joan – Manager, Corporate Communications.

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**Rider CPI.16****16. Specific Lobbying issues:****Bills:**

H.R. 2515, Anti-Spam Act;  
S. 877, Can-Spam Act.

**Congressional Issues:**

Privacy of customer financial information;  
Unsolicited electronic mail;  
Business continuity planning;  
Protecting information security.

**Executive Branch Issues:**

Straight-through processing, privacy of customer financial information;  
Unsolicited electronic mail;  
Business continuity planning;  
Protecting information security;  
Internet securities trading, including day trading and suitability;  
Electronic payments to broker-dealers;  
Mutual fund late trading, market timing, revenue sharing, and differential compensation issues.

**Rider CPI.17****17. Houses of Congress and Federal agencies contacted:**

House of Representatives;  
United States Senate;  
Securities and Exchange Commission;  
Federal Reserve Board;  
United States Department of Treasury;  
Office of Management and Budget;  
United States Department of Justice;  
Federal Trade Commission;  
Critical Infrastructure Protection Board.

**Rider CPI.18****18. Name and title of each employee who acted as a lobbyist:**

Judge, J. Steven – Senior Vice President, Government Affairs;  
Hunt, Richard – Senior Vice President, Federal Policy. *Covered Official Position: Chief of Staff, Representative McCrery, July 1989 to June 2001;*  
Michaelis, Daniel V. – Assistant Vice President, Corporate Communications;  
Spellman; James D. – Senior Vice President, Corporate Communications;  
Kursman, Scott C. – Vice President and Associate General Counsel;  
Paret, Jonathan P. – Vice President and Legislative Counsel;  
Draper, Margaret – Vice President, Corporate Communications;  
Christian, Joan – Manager, Corporate Communications;  
Conlon, Christine – Assistant Vice President, Corporate Communications;  
Udoff, Michael D. – Vice President and Associate General Counsel;  
Kramer, George R. – Vice President and Acting General Counsel;  
Trager, Art – Vice President and Managing Director, Technology and Business Continuity;  
Robinson, Rachel – Vice President. *Covered Official Position: Director of Speaker's Operations, Office Speaker of the House of Representatives, January 1996 to December 1998;*







**Rider FIN.16****16. Specific Lobbying issues:****Bills:**

H.R. 658 and S. 496, Accountant, Compliance and Enforcement Staffing Act;  
 H.R. 957, Broker Accountability Through Enhanced Transparency Act;  
 H.R. 975, Bankruptcy Abuse Prevention and Consumer Protection Act;  
 H.R. 1115 and S. 274, Class Action Fairness Act;  
 H.R. 1375, Financial Services Regulatory Relief Act;  
 H.R. 1766, National Uniform Privacy Standards;  
 H.R. 2179, Securities Fraud Deterrence and Investor Restitution Act;  
 H.R. 2420, Mutual Funds Integrity and Fee Transparency Act;  
 H.R. 2622, Fair and Accurate Credit Transaction Act;  
 H.R. 2043, United States Committee for Fair Capital Standards Act;  
 H.R. 2799, Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriation Act of 2004;  
 H.R. 2989, Transportation, Treasury, and Independent Agencies Appropriations Act of 2004;  
 S. 1753, Fair Credit Reporting;  
 S. 1822, Mutual Fund Transparency Act;  
 S. 1971, Mutual Fund Investor Confidence Restoration Act;  
 S. 1958, Mutual Fund Investor Protection Act;  
 S. 2059, Mutual Fund Reform Act of 2004;  
 HR 4520, American Jobs Creation Act;  
 HR 743, Social Security Protection Act;  
 HR 4849, Retirement Security for Life Act.

**Congressional Issues:**

Arbitration of employment disputes;  
 Intellectual property rights in databases;  
 Reduction in and Calculation of Section 31 fees;  
 Basel II Capital Accords;  
 Database protection;  
 SEC disclosure rules for public offerings;  
 Protection of data and databases from misappropriation;  
 Unpaid arbitration awards;  
 President's Working Group recommendations on OTC derivatives and financial reporting of risk exposure;  
 Hedge fund issues generally;  
 Use of electronic media to satisfy federal securities law delivery requirements (SEC interpretations);  
 Securities analyst independence and performance;  
 Sub-penny decimals trading;  
 Conversion to stock trading in decimals;  
 Margin loans to employees of the broker-dealer and its affiliates;  
 Uniform national standards for securities regulation;  
 Ensuring passage of increased SEC appropriation;  
 Expansion of SEC enforcement powers;  
 Mutual fund issues, including late trading, market timing, disclosure of fees and revenue streams, 4:00 PM on mutual fund redemption orders, soft dollars, and directed brokerage;  
 Treasury Attaché to European Union;  
 SEC Office of Global Security Risk.

**Executive Branch Actions:**

SEC Rule 10b-10;



Investment Banking Holding Companies;  
 SEC Framework for Consolidated Supervised Entities;  
 Clarification of distinctions between definitions of “broker-dealer” and “investment adviser”;  
 Hedge funds, including investment adviser and investment company compliance programs;  
 Electronic Communication Network (ECN) access fees;  
 SEC staffing needs;  
 IPO allocation and pricing practices under Regulation M;  
 Supervision of branch offices;  
 Public Company Accounting Oversight Board regulation of audits of non-public broker-dealers and of f  
 issuers;  
 Disclosure of after-tax yield on mutual funds;  
 Securities analyst independence and performance;  
 Decimalization and use of subpennies in securities trading;  
 Proxy solicitation;  
 Revisions to SEC record storage rules;  
 Fixed income price transparency;  
 Use of electronic media to satisfy federal securities law delivery requirements (SEC interpretations);  
 Electronic record retention issues;  
 Independent firm compliance activities;  
 Insurance and annuity compliance activities;  
 SEC “principal trading” relief proposal (Rule 206(3) of the Investment Advisers Act);  
 Best execution and payment for order flow;  
 Privacy requirements of Gramm-Leach-Bliley Act;  
 Functional regulation issues under the Gramm-Leach-Bliley Act;  
 Proposed interpretations of Rule 15c3-1, including reducing capital charges for certain securities held in  
 dealer inventory;  
 Reform to rules under Section 17(a) of the Investment Company Act and Section 206(3) of the Investm  
 Advisers Act;  
 World Trade Organization and access of U.S. broker-dealers to foreign markets;  
 Establishment of SEC Office of Global Security Risk;  
 Company registration and prospectus delivery issues;  
 Proposed revisions to the securities offering process under the Securities Act of 1933;  
 Interpretations of net capital rules;  
 Regulation of derivative products;  
 Broker-dealer retention of e-mail and interpretation of Exchange Act Rule 17a-3;  
 Disclosure of order routing and potential for private civil liability;  
 Soft dollar payments among broker-dealers and other market participants;  
 Possible consolidation or restructuring of self-regulatory organizations;  
 Information required to be maintained by fiduciaries such as investment advisers under Rule 17a-3;  
 Modification of restrictions on principal transactions under rule 206(3) of the Advisers Act;  
 Exemption from bonding requirements of Section 412 of ERISA;  
 Agency cross-trading restrictions under ERISA;  
 Broker-dealer advertising practices;  
 Disclosure of 401(k) fees to consumers;  
 Proposals to SEC regarding filing requirements for certain mutual fund advertising and sales literature;  
 Proposals to SEC regarding mutual fund fees;  
 Proposals by the NASD and private-sector bodies to improve trade reporting and transparency in the co  
 debt markets;  
 Financial Stability forum of the G-7 nations;  
 Prohibited transaction class exemption application regarding sections 406(a)(I)(A)-(D) and 406(b) of El  
 Compensation and referral fee issues under NASD Rule 1060 and as a result of the Gramm-Leach-Blile  
 Regulatory and compliance issues regarding trading restricted by the U.S. Treasury Department’s Offic  
 Foreign Assets Control;  
 SEC #6313f9dd-24af-4710-9d94-3d1665e41baa - Page 21 of 58



Patents of financial products;  
 Possible expansion of SIPC insurance to cover fraud claims against broker-dealers;  
 Certificate of deposit sales practices;  
 Point of sale and confirmation disclosure on mutual fund fees;  
 Underwriter's compensation;  
 Global straight-through processing;  
 Regulatory treatment of Investment Bank Holding Companies under the Gramm-Leach-Bliley Act and requests for no-action letters under the SEC's capital rules;  
 Possible promulgation of rules for capital treatment and registration of Investment Bank Holding Companies;  
 Responding to inquiries on potential candidates for SEC chairmanship and commissioners;  
 Regulation of variable annuities;  
 Status of NASD Rule 3030 and 3040 in light of the Gramm-Leach-Bliley Act;  
 Shortening the settlement cycle to trade date plus one;  
 Best execution for options;  
 Options market linkages;  
 Dealer accounting issues and FASB;  
 SEC Rule 206(4)-3 on cash solicitations;  
 Proposal for reduced capital early warning requirements for broker-dealers that have strong policies and procedures for managing customer debits;  
 Request for permitting broader range of securities to be used as collateral for Rule 15c3-3 deposits;  
 Proposal for SEC regulation of Investment Bank Holding Companies;  
 Implementation of Commodity Futures Modernization Act;  
 NASD Alternative Display Facility proposal;  
 Investment adviser referral fees;  
 Investment adviser code of ethics;  
 Nasdaq supermontage;  
 Allocation of IPOs by underwriters;  
 Reduction in and calculation of Section 31 fees;  
 SEC Joint Forum on Disclosure;  
 Treatment of dual registrants in bankruptcy;  
 Regulatory framework for 529 plans;  
 Broker-dealer rules under Form ADV Part 2;  
 General Accounting Office study of investment banks;  
 SEC study of market structure issues;  
 Unlisted trading privilege exchange trading issues;  
 Mutual fund advertising proposed regulations;  
 Mutual fund affiliate transactions;  
 Mutual fund proxy disclosures;  
 Implementation of new rules under the Sarbanes-Oxley Act;  
 Efforts to obtain a regulation that would permit "portfolio margining" for customers of a broker-dealer;  
 Mutual fund breakpoints;  
 Accounting for derivatives and fair-value accounting;  
 Possible reforms of Soft Dollars;  
 Directed brokerage;  
 Mutual fund issues, including late trading, market timing, disclosure of fees and revenue streams, 4:00 on mutual fund redemption orders, revenue flows between mutual funds and broker-dealers, point-of-sale disclosures to mutual fund customers;  
 Pricing of new issue securities by underwriters;  
 Proposals to improve issuer disclosure of management discussion and analysis and critical accounting |  
 SEC Short Sale Rule Proposal (Regulation SHO);  
 Locked and crossed markets;  
 Trading halts;  
 Stock index pricing and markets, certification proposal for chief compliance officers and chief executives

officers;

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SEC Proposed Rule 15c2-2 under the Exchange Act;  
 SEC Proposed Rule 15c2-3 under the Exchange Act;  
 SEC's Proposed Regulation National Market System (NMS) Rule Proposal;  
 Options Market Concept Release;  
 SEC inquiry into auction-rate securities;  
 Investor-education funds available under Global Research Settlement;  
 Gender diversity in financial services industry;  
 Coordination and duplication of SEC and SRO examinations;  
 Ability of broker-dealers to offer fee-based brokerage services outside Investment Advisers Act;  
 Financial analysis of securities industry profitability;  
 Proposed structural finance guidance by SEC and bank regulators;  
 New York Stock Exchange hybrid market proposal published by SEC;  
 SEC's self-regulatory organization governance reform proposal;  
 New York Stock Exchange Open Book fee proposal.

### **Rider FIN.17**

#### **17. Houses of Congress and Federal agencies contacted:**

House of Representatives;  
 United States Senate;  
 Securities and Exchange Commission;  
 Federal Reserve Board;  
 United States Department of Treasury;  
 Commodity Futures Trading Commission;  
 General Accounting Office;  
 Department of Justice;  
 United States Patent and Trademark Office;  
 Judicial Review Commission on Foreign Asset Control;  
 Department of Commerce;  
 White House;  
 Department of State;  
 United States Trade Representative;  
 Municipal Securities Rulemaking Board;  
 Federal Communications Commission;  
 Public Company Accounting Oversight Board;  
 Department of Homeland Security  
 Office of Comptroller of the Currency.

### **Rider FIN.18**

#### **18. Name and title of each employee who acted as a lobbyist:**

Judge, J. Steven – Senior Vice President, Government Affairs;  
 Lackritz, Marc E. – President;  
 Kittell, Don – Executive Vice President;  
 Paret, Jonathan P. – Vice President and Legislative Counsel;  
 Rives, Elizabeth L. – Vice President, Policy Analysis and Communications;  
 Spellman, James D. – Senior Vice President, Corporate Communications;  
 Michaelis, Daniel V. – Assistant Vice President, Corporate Communications;  
 Kramer, George R. – Vice President and Associate General Counsel;  
 Quinn, Gerard J. – Vice President and Associate General Counsel;  
 Udoff, Michael D. – Vice President and Associate General Counsel;  
 Kursman, Scott C. – Vice President and Associate General Counsel;  
 McClanahan, Patricia – Vice President and Director, Tax Policy. *Covered Official Position: Tax Coun*

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Sorcher, Alan – Vice President and Associate General Counsel. *Covered Official Position: Counsel, Federal Reserve Board, January 1993 to March 1999;*  
Robinson, Rachel – Vice President. *Covered Official Position: Director of Speaker's Operations, Office of the Speaker of the House of Representatives, January 1996 to December 1998;*  
Aly, Amal – Vice President and Associate General Counsel;  
Hunt, Richard – Senior Vice President, Federal Policy. *Covered Official Position: Chief of Staff, Representative McCrery, July 1989 to June 2001;*  
Storrs, Josie Gray – Vice President, Congressional Relations;  
Vlcek, Ann – Vice President and Associate General Counsel;  
Gannon, Rob – Vice President, Management Services;  
Maurello, John – Vice President and Managing Director, Marketing and Member Services;  
Price, Thomas F. – Vice President and Director, Marketing Services;  
Draper, Margaret – Vice President, Corporate Communications;  
Christian, Joan – Manager, Corporate Communications;  
Brandon, Kyle – Vice President and Director, Securities Research  
Hammerman, Ira – Senior Vice President and General Counsel;  
Mills, Robert – Vice President and Director, Industry Trends.

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**Rider HOM.16**

**16. Specific Lobbying issues:**

Congressional Issues:

Business continuity planning;  
Anti-money laundering proposals.

Executive Branch Issues:

Money-laundering regulations for broker-dealers;  
Implementation of anti-money-laundering provisions of the Patriot Act, Pub. L. No. 107-56.

**Rider HOM.17**

**17. House of Congress and Federal agencies contacted:**

SEC Office of Global Security Risk;  
Securities and Exchange Commission;  
State Department;  
Treasury Department;  
National Security Counsel;  
United States Treasury Office of Foreign Assets Control;  
Department of Homeland Security.

**Rider HOM.18**

**18. Name and title of each employee who acted as a lobbyist:**

Sorcher, Alan – Vice President and Associate General Counsel;  
Hunt, Richard – Senior Vice President, Federal Policy. *Covered Official Position: Chief of Staff, Representative McCrery, July 1989 to June 2001;*  
Strongin, David G. – Vice President and Director, International Finance.

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**Rider RET.16****16. Specific Lobbying issues:****Bills:**

H.R. 1776, Pension Preservation and Savings Expansion Act.

**Congressional Issues:**

Permanence of 529 plans;  
Retirement Savings Initiatives.

**Executive Branch Actions:**

Treasury and IRS meetings on SIMPLE plan regulations, and regulations relating to IRAs, Roth IRAs, and Education IRA;  
Exemption from bonding requirements of Section 412 of ERISA;  
Agency cross-trading restrictions under ERISA;  
Affiliated transactions under ERISA;  
Interpretations of Section 404(c) of ERISA;  
Administration's FY 2003 budget – LSA, Retirement Savings Account, ERSA;  
Retirement plan expenses;  
Regulations under EGTRRA – IRA, pension, and education savings accounts and 529 plans;  
Implementation of regulations on catch-up provisions of EGTRRA;  
Application of IRS regulations 2001-14, -72 and -73 to stock options;  
Education savings: IRS regulations 2001-73 and 2001-81;  
Initiatives in response to the collapse of Enron and the impact of bankruptcy on 401(k) plans invested in company stock;  
IRS Plan Determination Letter – Request for information on reforms to the process for obtaining a determination letter for employer-sponsored retirement plans;  
Regulation of qualified tuition plans, disclosure issues and other sales practice guidance;  
Disclosure of float payments to financial institutions;  
SEC task force on 529 plans;  
Proposed rules for late-trading and market timing;  
Treasury budget proposals clarifying designated beneficiary.

**Rider RET.17****16. Houses of Congress and Federal agencies contacted:**

House of Representatives;  
United States Senate;  
White House;  
United States Department of Treasury;  
Internal Revenue Service;  
Department of Labor;  
Securities and Exchange Commission;  
Municipal Securities Rulemaking Board.

**Rider RET.18****18. Name and title of each employee who acted as a lobbyist:**

Judge, J. Steven – Senior Vice President, Government Affairs;  
  
Spellman, James D. – Senior Vice President, Corporate Communications;  
Lackritz, Marc E. – President;  
Michaelis, Daniel V. – Assistant Vice President, Corporate Communications;

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McClanahan, Patricia – Vice President and Director, Tax Policy. *Covered Official Position: Tax Couns Senate Finance Committee, February 1992 to June 1997;*  
Udoff, Michael D. – Vice President and Associate General Counsel;  
Rives, Elizabeth L. – Vice President, Policy Analysis and Communications;  
Varley, Elizabeth – Vice President and Director, Retirement Policy. *Covered Official Position: Counse Senate Special Committee on Aging, February 1995 to April 1999;*  
Robinson, Rachel – Vice President. *Covered Official Position: Director of Speaker's Operations, Offic Speaker of the House of Representatives, January 1996 to December 1998;*  
Hunt, Richard – Senior Vice President, Federal Policy. *Covered Official Position: Chief of Staff, Repre McCrery, July 1989 to June 2001;*  
Draper, Margaret – Vice President, Corporate Communications;  
Christian, Joan – Manager, Corporate Communications;  
Mills, Robert – Vice President and Director, Industry Trends.

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**Rider TAX.16****16. Specific Lobbying issues:****Bills:**

P.L. 108-27, Jobs and Growth Tax Relief Reconciliation Act;

H.R. 1357 and S. 676;

S. 2498 (concerning reporting obligations and penalties with respect to certain transactions);

S. 476, CARE Act (provisions concerning tax shelters);

H.R. 5095, H.R. 2896, S. 1637, and H.R. 4520 [American Jobs Creation Act of 2004] (international tax especially elective interest expense allocation rules, earnings stripping changes, Section 956 changes, foreign tax credits on "permanent difference" items, modify rules for foreign tax credit "baskets");

S. 1475 (international changes, including permanence for Subpart F reforms for financial services firms

S. 936 and S. 1975 (limiting deductibility of settlement payments);

HR 4849, Retirement Security for Life Act;

HR 5395, S. 3019, Technical Corrections to Internal Revenue Code of 1986.

**Congressional Issues:**

Integration of the corporate and individual income taxes;

Reduced taxation of corporate earnings and dividend income;

Treatment of payments in lieu of dividends under reduced dividend rates;

Treatment of foreign distributions under reduced dividend rates;

Capital gains reductions;

Permanent reforms of Subpart F with respect to the active financial services income of financial service

Proposals to change IRC Section 163(j) (limiting interest deductions of subsidiaries of foreign companies)

International tax rules concerning foreign tax credits (interest allocation rules, financial services income as "base case" basket for credits relating to permanent tax base differences, 10/50 companies, overall deficit loss);

Exclusion for individuals of an amount of capital gains distributions from mutual funds;

Withholding tax treatment of earnings of regulated investment companies paid to foreign persons;

Reform of Subpart F more generally, territorial tax systems generally;

Changes to IRC Section 956 (deemed repatriation);

Changes to IRC Section 904(g) (resourcing rules);

Relief of double taxation on global dealing operations;

Valuation of securities for purposes of mark-to-market tax rules (IRC Section 475);

Due date for providing information returns to payees;

Electronic provision of information returns to payees;

Changes to IRC Section 162(f) (deductibility of settlement payments);

Changes to IRC Section 163(l) (disallowance of certain interest payments);

Changes to IRC Section 1059 (extraordinary dividends);

Changes to the tax treatment of contingent payment convertible debt;

Corporate rate reductions;

Corporate and individual capital gains issues (e.g., rate reductions, exclusions from income);

Capital gains deferral for investors in mutual funds;

Pending legislative proposals concerning tax shelters;

Internal Revenue Code ("IRC") Section 6111 (registration of confidential tax shelters);

IRC Section 6112 (investor lists and regulations thereunder, as well as associated penalties);

IRC Section 6011 (taxpayer disclosure of certain transactions);

Joint Committee on Taxation and Treasury studies on corporate tax shelters;

Proposals to codify economic substance doctrine;

Extension of the R&E tax credit (IRC Section 41) and treatment of expenses of internal use software;

Possible legislative proposals relating to hybrid arrangements;

Straddle rules and need for "qualified covered calls" exception;

Changes to IRC Section 911 (exclusion for individuals of earnings abroad);

Tax treatment of income deposit securities.

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Executive Branch Actions:

Reduced taxation of dividends (securities lending transactions, information reporting of “in lieu of” pay qualifying foreign equities, reporting of payments on foreign securities, backup withholding, and treatment of financial intermediaries);

Valuation of securities under IRC Section 475 (mark to market tax rules);

Permanent reform of Subpart F, especially with respect to the active financial services income of financial services firms;

Reform of Subpart F more generally;

Pending legislative proposals concerning corporate tax shelters, including codification of economic substance doctrine;

Proposed regulations under IRC Section 482 that would provide rules for allocating among affiliates and sourcing the income from a global dealing operation;

OECD proposals for attribution of profits to permanent establishments;

Proposed Section 482 Services Regulations;

International tax changes concerning foreign tax credits (interest allocation rules, financial services income basket as “base case” basket);

Withholding tax treatment of earnings of regulated investment companies paid to foreign persons;

IRC Section 956 (concerning making a market in a U.S. affiliate’s securities and other aspects to rationalize rules);

IRC Section 904(g) (resourcing of foreign-source income);

Regulations under IRC Sections 6011, 6111 and 6112 (addressing corporate tax shelters);

Possible means of prevention of overtaxation of earnings from a global dealing operation (possible changes to IRC Section 245(b));

Regulations under Section 1441 of the IRC (and related sections) and subsequent IRS notices concerning reporting and withholding obligations with respect to payments to foreign persons;

IRC Section 263(g) (capitalization with respect to straddles);

Due date for providing information returns to payees generally (including proposal to move date to February for nominees);

Electronic provision of information returns to customers;

Corporate rate reductions;

Corporate and individual capital gains issues generally (e.g., rate reductions, exclusions from income);

IRC Section 41 (regulations concerning internal use software and other issues);

Treasury Regulation Section 1.904-6 (concerning the allocation of foreign tax credits among various income “baskets”);

Tax treatment of payments in lieu of dividends;

Changes to IRC Section 162(f);

Tax treatment of income deposit securities;

Tax treatment of contingent convertible debt;

Tax treatment of qualified covered calls

Tax reporting on taxable mergers and acquisitions.

Rider TAX.17**17. Houses of Congress and Federal agencies contacted:**

House of Representatives;

United States Senate;

United States Department of Treasury;

Internal Revenue Service;

White House;

Advisory Commission on Electronic Commerce.

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**Rider TAX.18****18. Name and title of each employee who acted as a lobbyist:**

Judge, J. Steven – Senior Vice President, Government Affairs;  
 Lackritz, Marc E. – President;  
 Rives, Elizabeth L. – Vice President, Policy Analysis and Communications;  
 Spellman, James D. – Senior Vice President, Corporate Communications;  
 Michaelis, Daniel V. – Assistant Vice President, Corporate Communications;  
 McClanahan, Patricia – Vice President and Director, Tax Policy. *Covered Official Position: Tax Couns Senate Finance Committee, February 1992 to June 1997;*  
 Varley, Elizabeth – Vice President and Director, Retirement Policy *Covered Official Position: Counsel, Senate Special Committee on Aging, February 1995 to April 1999;*  
 Robinson, Rachel – Vice President. *Covered Official Position: Director of Speaker's Operations, Office Speaker of the House of Representatives, January 1996 to December 1998;*  
 Hunt, Richard – Senior Vice President, Federal Policy. *Covered Official Position: Chief of Staff, Repr. McCrery, July 1989 to June 2001;*  
 Draper, Margaret – Vice President, Corporate Communications;  
 Christian, Joan – Manager, Corporate Communications;  
 Traub, Jonathan G. – Vice President, Federal Tax Legislation;  
 Paret, Jonathan P. – Vice President and Legislative Counsel  
 Brandon, Kyle – Vice President and Director, Securities Research;  
 Mills, Robert – Vice President and Director, Industry Trends.

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**Rider TEC.16**

**16. Specific Lobbying issues:**

**Executive Branch Issues:**

SEC interpretations of record storage requirements;  
Requirements for record delivery and retention under Electronic Signatures legislation;  
SEC requirements on internal and external e-mail record retention.

**Rider TEC.17**

**17. Houses of Congress and Federal agencies contacted:**

Securities and Exchange Commission;  
Office of Management and Budget.

**Rider TEC.18**

**18. Name and title of each employee who acted as a lobbyist:**

Lackritz, Marc E. – President;  
Kursman, Scott – Vice President and Associate General Counsel;  
Spellman, James D. – Senior Vice President, Corporate Communications;  
Michaelis, Daniel V. – Assistant Vice President, Corporate Communications;  
Draper, Margaret – Vice President, Corporate Communications;  
Christian, Joan – Manager, Corporate Communications.

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**Rider TRD.16****16. Specific Lobbying issues:**Bills:

H.R. 2738, United States-Chile Free Trade Agreement Implementation Act;  
 H.R. 2739, United States-Singapore Free Trade Agreement Implementation Act;  
 H.R. 4759, United States-Australia Free Trade Agreement Implementation Act.

Congressional Issues:

European Union data protection directive;  
 European Union Financial Services Action Plan;  
 Foreign Sales Corp./ Extraterritorial Income ruling of World Trade Organization and needed U.S. intertax changes/reforms;  
 Free Trade Agreements.

Executive Branch Actions:

Financial Stability forum of the G-7 nations;  
 Financial privacy;  
 Principles for greater transparency in foreign regulatory regimes;  
 Tax impediments to expanding trade;  
 World Trade Organization discussion regarding inclusion of “financial services”;  
 World Trade Organization investment issues;  
 US-Chile Free Trade Agreement;  
 US-Singapore Free Trade Agreement;  
 US-Australia Free Trade Agreement;  
 Indonesia Investment Climate;  
 China market access;  
 World Trade Organization financial service negotiations/capital market sanctions;  
 Continuation of U.S. Treasury attaché in Tokyo;  
 Establishment of U.S. Treasury attaché in Brussels;  
 Sarbanes-Oxley Act extraterritorial applications;  
 Russian accession to the World Trade Organization;  
 Australia Free Trade Access;  
 Morocco Free Trade Access;  
 NJ Call Center Legislation;  
 SEC Framework on Consolidated Supervise Entities;  
 Qualification requirements of patent examiners and attorneys;  
 Bi-lateral Investment Treaty;  
 CFTC Capital Requirements for Broker-dealers that are part of Consolidated Supervisory Entity registr.

**Rider TRD.17****17. Houses of Congress and Federal agencies contacted:**

United States Department of the Treasury;  
 Office of the United States Trade Representative;  
 House of Representatives;  
 United States Senate;  
 White House;  
 Commerce;  
 Securities and Exchange Commission;  
 Department of State;  
 United States Patent and Trade Office;  
 Commodities and Futures Trading Commission.

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**Rider TRD.18****18. Name and title of each employee who acted as a lobbyist:**

Judge, J. Steven – Senior Vice President, Government Affairs;

Lackritz, Marc E. – President;

Spellman, James D. – Vice President, Corporate Communications;

Michaelis, Daniel V. – Assistant Vice President, Corporate Communications;

Quinn, Gerard J. – Vice President and Associate General Counsel;

Sorcher, Alan – Vice President and Associate General Counsel. *Covered Official Position: Counsel, Federal Reserve Board, January 1993 to March 1999;*

Strongin, David G. – Vice President and Director, International Finance;

McClanahan, Patricia – Vice President and Director, Tax Policy. *Covered Official Position: Tax Counsel, Senate Finance Committee, February 1992 to June 1997;*

Draper, Margaret – Vice President, Corporate Communications;

Christian, Joan – Manager, Corporate Communications.

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Registrant Name Securities Industry Association Client Name Securities Industry Association

**Information Update Page - Complete ONLY where registration information has changed.**

20. Client new address

Address

City State Zip Code Country

21. Client new principal place of business (if different than line 20)

City State Zip Code Country

22. New general description of client's business or activities

**LOBBYIST UPDATE**

23. Name of each previously reported individual who is **no longer** expected to act as a lobbyist for the client

First Name Last Name Suffix First Name Last Name S

1 James Spellman  3

2  4

**ISSUE UPDATE**

Find the code to select below.

24. General lobbying issues that **no longer** pertain

**AFFILIATED ORGANIZATIONS**

25. Add the following affiliated organization(s)

Name	Address	Principal place of Business (city and state or country)
Foundation for Investor Education	Address 120 Broadway C/S/Z New York NY 10271 Address C/S/Z	City State Country City State

26. Name of each previously reported organization that is **no longer** affiliated with the registrant or client

1  2  3

**FOREIGN ENTITIES**

27. Add the following foreign entities

Name	Address	Principal place of business (city and state or country)	Amount of contribution for lobbying activities	Ownership percentage
Street Address City	State/Province Country	City State Country		

28. Name of each previously reported foreign entity that **no longer** owns, **or** controls, **or** is affiliated with the registrant, affiliated organization

1  3  5  
 2  4  6

Add a page for more

Printed Name and Title Ira Hammerman, Senior Vice President and General Counsel February 14, 21

A handwritten signature in black ink, appearing to read "John A. Walker", written in a cursive style.